National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



July 13, 2010

Reply to Attn of:

General Law Practice Group

TO:

Distribution

FROM:

Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Galileo to the

Outer Planets Reception on July 15, 2010

On July 15, 2010, co-sponsors, the California Institute of Technology and Applied Physics Laboratory, both non-profit organizations under 501(c)(3) of the Internal Revenue Code, are hosting along with NASA a reception at the Rayburn House Office Building, in Washington, D. C. from 4:00 p. m.-6:00 p. m.

Approximately 1,500 people have been invited, and to a large number of invitees are expected to attend. The estimated cost of the reception including all food and beverages, is \$25.00 per person. The reception will be attended by representatives of the aerospace industry, state and local officials, the media, the legislative branch, and academia, as well as by employees of other Federal agencies. I find that this reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow attendees to exchange information regarding various NASA programs. Moreover, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone